

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ENTROPIC COMMUNICATIONS, LLC,

Plaintiff,

v.

CHARTER COMMUNICATIONS, INC.,

Defendant.

Civil Action No. 2:22-cv-00125-JRG

JURY TRIAL DEMANDED

**DECLARATION OF MICHAEL T. PIEJA IN SUPPORT OF PLAINTIFF
ENTROPIC COMMUNICATIONS, LLC'S OPPOSED MOTIONS *IN LIMINE***

I, Michael T. Pieja, hereby declare:

1. I am a partner at the law firm Goldman Ismail Tomaselli Brennan & Baum LLP. I am counsel of record for Plaintiff Entropic Communications, LLC in this matter. I submit this declaration in support of Plaintiff Entropic Communications, LLC's Opposed Motions *in Limine*.

2. I am over 18 years of age and competent to make this declaration. If called to testify as a witness in this matter, I could and would testify truthfully to each of the statements in this declaration, which are based on my personal knowledge and conversations with individuals at my law firm who participated in the events recited herein.

3. Attached as Exhibit A is an excerpted true and correct copy of the deposition transcript of Daniel Boglioli, taken on August 11, 2023. This exhibit contains confidential information and is accordingly being filed under seal pursuant to the Protective Order entered in this case (ECF No. 36).

4. Attached as Exhibit B is a true and correct copy of Plaintiff Entropic Communications, LLC's Preliminary Trial Witness List, dated September 28, 2023. This exhibit contains confidential information and is accordingly being filed under seal pursuant to the Protective Order entered in this case (ECF No. 36).

5. Attached as Exhibit C is a true and correct copy of Defendant Charter Communications, Inc.'s Preliminary Trial Witness List, dated September 28, 2023. This exhibit contains confidential information and is accordingly being filed under seal pursuant to the Protective Order entered in this case (ECF No. 36).

6. Attached as Exhibit D is an excerpted true and correct copy of the Rebuttal Expert Report of W. Christopher Bakewell, dated August 11, 2023, excluding attachments thereto. This exhibit contains highly confidential information and is accordingly being filed under seal pursuant to the Protective Order entered in this case (ECF No. 36).

7. Attached as Exhibit E is an excerpted true and correct copy of the Expert Report of Stephen E. Dell, CVA, dated July 21, 2023, excluding attachments thereto. This exhibit contains highly confidential information and is accordingly being filed under seal pursuant to the Protective Order entered in this case (ECF No. 36).

8. Attached as Exhibit F is an excerpted true and correct copy of the deposition transcript of Arlen Jay Kirchoff, Jr., taken on August 16, 2023. This exhibit contains confidential information and is accordingly being filed under seal pursuant to the Protective Order entered in this case (ECF No. 36).

9. Attached as Exhibit G is an excerpted true and correct copy of the deposition transcript of Peter Cangiane, taken on July 17, 2023. This exhibit contains confidential information

and is accordingly being filed under seal pursuant to the Protective Order entered in this case (ECF No. 36).

10. Attached as Exhibit H is an excerpted true and correct copy of the Rebuttal Expert Report of Dr. Kevin C. Almeroth, dated August 11, 2023. This exhibit contains highly confidential information and is accordingly being filed under seal pursuant to the Protective Order entered in this case (ECF No. 36).

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 10, 2023, in Chicago, Illinois.

/s/ Michael T. Pieja

Michael T. Pieja